

1 Brandi L. Harper, SBN 264672
2 Brandi@CastilloHarper.com
3 Joseph N. Bolander, SBN 280857
4 Joe@CastilloHarper.com
5 **CASTILLO HARPER APC**
6 6848 Magnolia Ave, Ste. 100
7 Riverside, CA 92506
8 Telephone: (909) 466-5600
9 Facsimile: (909) 466-5610

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 JASON ADAMS; on behalf of himself
13 and all others similarly situated,

14 Plaintiffs,

15 vs.

16 CITY OF BALDWIN PARK; and DOES
17 1 THROUGH 10, inclusive,

18 Defendant.
19
20
21

Case No.: 2:19-cv-00297-PA-GJS

Hon. Percy Anderson

STIPULATION FOR DISMISSAL

22 Pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii), and this
23 Court's September 8, 2019 Order Approving the parties FLSA collective action
24 settlement agreement [Doc. No. 109], the following Stipulation for Dismissal is
25 entered into between Plaintiffs Jason Adams, et al, and Defendants City of
26 Baldwin Park:
27
28

1 1. WHEREAS, on or about January 15, 2019, Plaintiff Jason Adams
2 filed an FLSA collective action on behalf of himself and others similarly situated
3
4 against Defendant City of Baldwin Park in United States District Court, Central
5 District of California, 2:19-cv-00297-PA-GJS;

6
7 2. WHEREAS, the Parties have reached an agreement to settle this
8 matter in its entirety, an agreement that was previously approved by this Court in
9 its September 8, 2019 Order [Doc. No. 109], a fully executed copy of which is
10 attached hereto as Exhibit "A";

11
12 NOW THEREFORE, the Parties, by and through their counsel of record,
13 hereby stipulate and apply for the following relief:
14

15 1. This action is hereby dismissed in its entirety with prejudice as to all
16 defendants and causes of action pursuant to Federal Rules of Civil
17 Procedure, Rule 41(a)(1)(A)(ii);

18
19 2. Each Party shall bear their own attorneys' fees and costs, subject to the
20 terms of the attached settlement agreement;

21
22 The Court shall retain jurisdiction to enforce the terms of the parties' written
23 Settlement Agreement for a period of one (1) year from the date the dismissal is
24 entered in this action.
25

26 ///

27 ///

1 IT IS SO STIPULATED:
2
3
4

5 Dated: October 25, 2019
6

CASTILLO HARPER, APC

7 By: /s/Joseph N. Bolander¹
8

Brandi L. Harper

9 Joseph N. Bolander

10 Attorneys for Plaintiffs

JASON ADAMS, et al.
11

12 Dated: October 25, 2019
13

RICHARDS WATSON & GERSHON

A Professional Corporation

14 By: /s/ Jennifer Petrusis
15

Jennifer Petrusis

16 Rebecca Green

17 Attorneys for Defendant, the CITY

OF BALDWIN PARK
18
19
20
21
22
23
24
25
26
27

28 ¹ I, Joseph N. Bolander, hereby attest that all the signatories listed, and on whose behalf the filing is submitted, concur in the content of this Stipulation of Dismissal and have authorized its filing.